

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

<hr style="border: 0.5px solid black; margin-bottom: 5px;"/> <div style="display: flex; justify-content: space-between;"><div style="width: 80%;"><p>KATHLEEN KEETER, individually and on : behalf of all others similarly situated, :</p><p style="text-align: center;">Plaintiff, :</p><p style="text-align: center;">v. :</p><p>GERBER PRODUCTS COMPANY, :</p><p style="text-align: center;">Defendant. :</p></div><div style="width: 10%; text-align: center;">:</div><div style="width: 10%;"><p>Case No. 1-21-cv-0269-LO-TCB</p></div></div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"><div style="width: 80%;"><hr style="border: 0.5px solid black; margin-top: 5px;"/><p>JAMIE MOORE, individually and on : behalf of all others similarly situated, :</p><p style="text-align: center;">Plaintiff, :</p><p style="text-align: center;">v. :</p><p>GERBER PRODUCTS COMPANY, :</p><p style="text-align: center;">Defendant. :</p></div><div style="width: 10%; text-align: center;">:</div><div style="width: 10%;"><p>Case No. 1-21-cv-0277-LO-TCB</p></div></div>			
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**UNOPPOSED MOTION OF PLAINTIFFS KATHLEEN KEETER AND JAMIE MOORE
TO CONSOLIDATE ACTIONS PURSUANT TO FEDERAL RULE OF CIVIL
PROCEDURE 42(a)(2)**

Plaintiffs Kathleen Keeter and Jamie Moore, by their counsel, hereby move to consolidate the two above-captioned related actions, and in support thereof, Plaintiffs rely upon the attached Brief, which is incorporated as if fully set forth herein.

Pursuant to Local Civil Rule 7(E), counsel for the parties' conferred regarding the substance of Plaintiffs' motion on March 10, 2021 and defense counsel represented that they do not oppose Plaintiffs' motion to consolidate these actions.

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Dated: March 11, 2021

Bonnett Fairbourn Friedman & Balint PC

s/Francis J. Balint, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic mail notice list

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 11, 2021.

s/Francis J. Balint, Jr.

Francis J. Balint, Jr.